

Exhibit K - Morrison

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF NANCY MARIE MORRISON

I, Nancy Marie Morrison, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the World Trade Center when the terrorist attacks of the World Trade Center Towers occurred.

4. I worked for Deloitte Touche at the World Trade Center.

5. I was in the lobby of the North Tower when the first plane crashed into the tower. I saw the fiery objects falling from the upper floors and realized I should try and get out to the street. I came out to the horrifying sight of people jumping from the upper floors. When the second plane hit there was utter pandemonium. In the ensuing chaos, I was knocked down and trampled by

people frantically fleeing. From an early age, when I first became cognizant of the fact that people could be trampled to death by other people, I not only feared trampling but was adamant that this was absolutely the one way I didn't want to die. That was my last thought before losing consciousness.

6. As a result of the terrorist attacks, I suffered the following specific injuries on September 11, 2001: left clavicle and rib fracture, bruising to left anterior chest wall, and a right knee injury – medial meniscal tearing causing altered gait and resulting in low back spasms. I subsequently manifested the following injuries determined to have been directly caused by the injuries sustained on September 11, 2001: consequential left knee injury, low back injury, low back pain and right hip.

7. As a result of my injuries, I lost both my job and a large international network of relationships that were built up over a span of nearly two decades. My continued impairments excluded me from my chosen profession because I am unable to walk any great distances and have difficulty standing for any length of time. This has impacted not only my professional aspirations but also my personal pleasures like hiking and strolling through the halls of art galleries. I can no longer dance. I am a singer, a member of a classical chorale, and I am the only one who must be seated on stage during performances. My life has never been the same.

8. I sought medical attention for my physical injuries: left clavicle and rib fracture, bruising to left anterior chest wall, and the injury to my right knee. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical injuries caused by the September 11, 2001 terrorist attacks.

9. My physical distress continues to this day. In November I had two ablation (nerve burning) procedures in hopes of alleviating worsening lower back pain. Unfortunately, I gained


no real relief and in six months I am scheduled to repeat this process. Wherever I was injured I am now arthritic. In December I had a cortisone shot in the right knee which had become extremely aggravated. The broken and then badly rejoined left clavicle bothers me enough to make me over use my right arm and now my right shoulder aches daily as well. I am scheduled for a cortisone injection in my shoulder in early January. I am currently in physical therapy twice a week for the lower back, knee and shoulder issues.

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I was originally treated for Post-Traumatic Stress Syndrome because I had difficulty facing large crowds, was hypersensitive and, if I heard a siren, my legs would shake to such a degree that I would have to brace myself against a building for fear of falling. (Anyone who was there will never forget the eerie sound of thousands of sirens blaring.) I have not had those particular symptoms for a long time. However, I recently volunteered for a study of the effects of trauma on aging at New York Columbia Presbyterian Hospital. After an extended interview process I was diagnosed as still suffering from post-911 PTSD and offered treatment.

10. I previously pursued a claim (VCF 0049363) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 3rd day of January, 2020.


Signature of Declarant, Nancy Marie Morrison

Exhibits Filed Under Seal